

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION, :
: Civil Action
Plaintiff, : No. 2:24-cv-04949-WB
v. :
: EMPIRE HOLDINGS GROUP LLC d/b/a :
ECOMMERCE EMPIRE BUILDERS d/b/a :
STOREFUNNELS.NET and PETER :
PRUSINOWSKI, :
: Defendants.

NOTICE OF RECEIVER'S ACCOUNTING

PLEASE TAKE NOTICE that the Receiver, Kevin Dooley Kent, hereby submits the Receiver's Accounting in follow-up to the Receiver's First Written Report to the Court (ECF No. 38) and pursuant to Section XII, Paragraph L of the Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief entered on September 20, 2024 ("TRO Order") (ECF No. 19) and Section XIII, Paragraph L of the Stipulated Preliminary Injunction entered on November 8, 2024 ("Stipulated PI") (ECF No. 49), both of which direct the Receiver to "[m]ake an accounting, as soon as practicable, of the Assets and financial condition of the receivership and file the accounting with the Court and deliver copies thereof to all parties[.]". The Receiver's Accounting is reflected in the Declaration of Michael R. Shanahan, which is attached hereto as Exhibit A.

Respectfully Submitted,

Dated: November 15, 2024

/s/ Robin S. Weiss
CLARK HILL PLC
Robin S. Weiss, Esquire
Vanessa L. Huber, Esquire

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